

SUPERIOR COURT OF N.J.
FILED

MAY 19 2003

DONALD F. PHELAN
CLERK

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ476-03-7(4)

Superior Court

Docket Number

03-05-00084-S

STATE OF NEW JERSEY)

v.)

SHAQUAN McLAURIN)

KIRK McNEIL)

ALNICA FRANKLIN)

OTIS CHRISTOPHER)

RODNEY MAYES)

and)

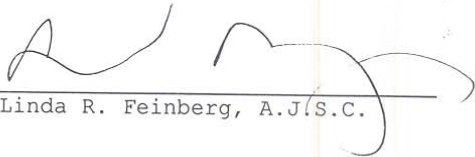
RAYNELLE HAMILTON)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 14th day of May, 2003, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Essex for filing.


Linda R. Feinberg, A.J./S.C.

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v.

SHAQUAN McLaurin

KIRK McNEIL

ALNICA FRANKLIN

OTIS CHRISTOPHER

RODNEY MAYES

and

RAYNELLE HAMILTON

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon their
oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

SHAQUAN McLaurin

KIRK McNEIL

ALNICA FRANKLIN

OTIS CHRISTOPHER

RODNEY MAYES

and

RAYNELLE HAMILTON

who are named as defendants herein, and Eric Boyer, who is a coconspirator but not named as a defendant herein, between on or about October 5, 1998 and on or about April 2, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crimes of health care claims fraud and theft by deception did agree that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation or commission of said crimes, that is:
 - 1. Knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in, or knowingly omit a material fact from, or cause a material fact to be omitted from, any record, bill, claim, or other document, in writing, electronically or in any other form, and attempt to submit, submit, cause to be submitted or attempt to cause to be submitted said record, bill, claim or other document for payment or reimbursement for health care services in the aggregate pecuniary amount of at least \$1,000 and involving five or more

COUNT TWO

(Health Care Claims Fraud - Second degree

SHAQUAN McLAURIN

KIRK McNEIL

ALNICSA FRANKLIN

OTIS CHRISTOPHER

RODNEY MAYES

and

RAYNELLE HAMILTON


being persons who are not practitioners, between on or about October 5, 1998, and on or about April 2, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely and knowingly did commit five or more acts of health care claims fraud and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000, in that the said SHAQUAN McLAURIN, KIRK McNEIL, ALNICSA FRANKLIN, OTIS CHRISTOPHER, RODNEY MAYES, and RAYNELLE HAMILTON purposely and knowingly did make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or purposely and knowingly did omit material facts from, or purposely and knowingly did cause material facts to be omitted from, any records, bills, claims or other documents, in writing, electronically or in any other form, that a person attempted to

acts of health care claims fraud, contrary to the provisions of N.J.S.A. 2C:21-4.3c; and

2. Purposely obtain the property of another in an amount greater than \$500 by deception, contrary to the provisions of N.J.S.A. 2C:20-4a.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

policy of Harold Gibb; WHEREAS, IN TRUTH AND IN FACT, as the said SHAQUAN McLaurin, Kirk McNeil, AlnicSA Franklin, Otis Christopher, Rodney Mayes, and Raynelle Hamilton well knew, the said motor vehicle accident was wholly fictitious and did not occur and the injuries complained of had not been sustained, and that any health care services thus provided were not compensable pursuant to the Personal Injury Protection (PIP) coverage contained in the automobile insurance policy aforesaid, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Vaughn L. McKoy
Acting Director
Division of Criminal Justice

A TRUE BILL:


_____, Foreperson

Dated: 5/19/03

submit, submitted, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services, that is, the said SHAQUAN McLaurin, Kirk McNeil, AlnicSA Franklin, Otis Christopher, Rodney Mayes, and Raynelle Hamilton purposely and knowingly did commit five or more acts of health care claims fraud and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000, in that the said SHAQUAN McLaurin, Kirk McNeil, AlnicSA Franklin, Otis Christopher, Rodney Mayes, and Raynelle Hamilton purposely and knowingly did make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in patient records, bills, claims or other documents, in writing, electronically or in any other form, that a person attempted to submit, submitted, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services to Progressive Insurance Company, said false, fictitious, fraudulent, or misleading statements of material fact relating to health care claims having an aggregate pecuniary benefit of at least \$1,000, and purporting that injuries were sustained by SHAQUAN McLaurin, Kirk McNeil, AlnicSA Franklin, Otis Christopher, Rodney Mayes, and Raynelle Hamilton in an automobile accident that allegedly occurred on October 5, 1998 in the City of East Orange, County of Essex, when the accident was wholly fictitious and did not occur and the injuries complained of had not been sustained, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-

4.3c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Attempted Theft by Deception - Third Degree)

SHAQUAN McLaurin

Kirk McNeil

AlnicSA Franklin

Otis Christopher

Rodney Mayes

and

Raynelle Hamilton

between on or about October 5, 1998 and on or about April 2, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain by deception the property of another in an amount in excess of \$500; that is, the said SHAQUAN McLaurin, Kirk McNeil, AlnicSA Franklin, Otis Christopher, Rodney Mayes, and Raynelle Hamilton purposely did attempt to obtain the property of Progressive Insurance Company, in excess of \$500 by creating or reinforcing the false impression that a motor vehicle accident occurred on October 5, 1998, in the City of East Orange, County of Essex, in which SHAQUAN McLaurin, Kirk McNeil, AlnicSA Franklin, Otis Christopher, Rodney Mayes, and Raynelle Hamilton sustained injuries requiring health care services, and that health care services provided for those injuries were compensable pursuant to the Personal Injury Protection (PIP) coverage contained in the automobile insurance